

John P. Aldrich, Esq. (Resident Counsel)
Nevada State Bar #6877
Aldrich Law Firm, Ltd.
7866 West Sahara Ave.
Las Vegas, NV 89117
Tel: (702) 853-5490
jaldrich@johnaldrichlawfirm.com

*Liaison Counsel for [Proposed]
Lead Plaintiff Carlos Marina*

Reed R. Kathrein (to be admitted *pro hac vice*)
Lucas E. Gilmore (to be admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
Telephone: (510) 725-3000
Facsimile: (510) 725-3001
reed@hbsslaw.com
lucasg@hbsslaw.com

*Attorneys for [Proposed]
Lead Plaintiff Carlos Marina*

[Additional counsel on signature page]

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TAD SCHLATRE, Individually and On
Behalf Of All Others Similarly Situated,

Plaintiff,

v.

MARATHON DIGITAL HOLDINGS, INC.,
f/k/a MARATHON PATENT GROUP, INC.,
MERRICK D. OKAMOTO, FREDERICK G.
THIEL, and SIMEON SALZMAN,

Defendants.

Case No.: 2:21-cv-02209-RFB-NJK

CLASS ACTION

**DECLARATION OF JOHN P.
ALDRICH IN SUPPORT OF
CARLOS MARINA'S OPPOSITION
TO COMPETING MOTIONS FOR
APPOINTMENT AS LEAD
PLAINTIFF AND APPROVAL OF
SELECTION OF LEAD COUNSEL**

1 I, John P. Aldrich, declare as follows:

2 1. I am a partner at the law firm Aldrich Law Firm, Ltd., Liaison Counsel for
3 class member Carlos Marina (“Movant”). I am an attorney licensed to practice law in the
4 State of Nevada. I make this declaration in support of Movant’s Opposition to Competing
5 Motions for Appointment as Lead Plaintiff and Approval of Movant’s Selection of Lead
6 Counsel. I have personal knowledge of the matters stated herein and, if called upon, I could
7 and would competently testify thereto.

8 2. Attached are true and correct copies of the following exhibits:

9 Exhibit A: Attached is a true and correct copy of a screenshot obtained from the
10 Bloomberg Terminal reporting the filing of Marathon’s quarterly report on Form 10-Q for
11 the period ending on September 30, 2021 on November 15, 2021, at 6:48 a.m. EDT; and

12 Exhibit B: Attached is a true and correct copy of Marathon trading prices
13 between November 12, 2021 and November 15, 2021, according to Yahoo Finance.

14 I declare under penalty of perjury under the laws of the United States of America
15 that the foregoing is true and correct. Executed this 1st day of March 2022, at Las Vegas,
16 Nevada.

17
18 /s/ John P. Aldrich
19 JOHN P. ALDRICH
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2022, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the e-mail addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List.

ALDRICH LAW FIRM, LTD.

/s/John P. Aldrich
John P. Aldrich, Esq.